

1 GILADI

2 police told me it contained heroin.

3 Q. What Police Department was that?

4 A. I believe it was Port Lee police.

5 Q. Do you have any police reports from  
6 that incident?

7 A. Not that I know of. I do not have the  
8 reports.

9 Q. Have you ever had those reports?

10 A. No, that I recall.

11 Q. On how many occasions did you see  
12 Dr. Terentiev?

13 A. I had to go for a screening test.

14 Q. That's what you had?

15 A. Yes.

16 Q. That was negative?

17 A. Yes.

18 Q. Any other visits to Dr. Terentiev?

19 A. As I said, I was for screening. The  
20 last time I saw him, not that I recall, I do  
21 not know. Maybe I had a cold or something like that  
22 but I do not know. I think most of the  
23 times only for this needle stick.

24 Q. Did he tell you you had high blood

25 pressure?

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2 A. He usually asked me if I am tense, and  
3 I said yes because he was touching my el -- he was  
4 touching my left hand (indicating).

5 Q. Did he suggest treatment for your high  
6 blood pressure?

7 A. He told me, he asked me, he told me to  
8 take treatment, but I never took it.

9 Q. What treatment did he recommend?

10 A. Medication for blood pressure.

11 Q. Did he tell you how high your blood  
12 pressure was?

13 A. At that time.

14 Q. Yes.

15 A. I did not recall.

16 Q. What medication did he suggest to you?

17 A. I have no -- he told me that he can  
18 reduce it by medication. I said, "Thank you, I am  
19 not taking medication."

20 Q. Why did you refuse medication for high  
21 blood pressure?

22 A. Because if I had high blood pressure,  
23 it is only because of my condition, because of  
24 medical reasons. And I do not need to take  
25 medication more than what already I am taking for

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2 my pain in my elbow, and pain in my back.

3 Q. Have you seen Dr. Kulik (phonetic) in  
4 the last five years?

5 A. Dr. Kulik is not my physician.

6 Q. I didn't ask you if he was your  
7 physician, I just asked you if you saw him?

8 A. I think I saw Dr. Kulik.

9 Q. When was that, that you saw Dr. Kulik?

10 A. I don't understand the question.

11 Q. When did you see Dr. Kulik?

12 A. I cannot recall. I think I was being  
13 sent to him by the Workmen's Comp.

14 Q. Did you have a discussion with

15 Dr. Kulik about returning to work?

16 A. I always wanted to go back to work.

17 Q. Did you tell Dr. Kulik that you were  
18 forced to return to work after your injury in 1992?

19 A. I never said that I was being forced to  
20 go to work in 1992. I said I was forced to go  
21 to work. It was in 1992 after my hand surgery.

22 Q. It was in 1992 when you were forced to go  
23 to work?

24 A. Yes. Because the doctor refused to  
25 give me medical note that I am out duty, to be off.

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2 [REDACTED] duty.

3 Q. [REDACTED] Who was it that refused to give you the  
4 [REDACTED] medical notes?

5 A. [REDACTED] Strauch.

6 MR. BURFORD: Let me have just this  
7 page marked as an exhibit?

8 (Whereupon, the aforementioned chart  
9 was marked as Defendant's Exhibit A for  
10 identification as of this date by the Reporter.)

11 Q. Let me show you what has been marked as  
12 Defendant's Exhibit A?

13 Have you ever seen that document  
14 before?

15 A. I believe so, yes.

16 Q. Is this a chart that reflects the  
17 totality of time you lost from work as far as you  
18 are claiming in this case?

19 A. This is reflecting all the time that I  
20 took time off from work because of my hand  
21 situation.

22 Q. The entirety of the time that you took  
23 off adds up to \$43,140. Is that correct?

24 A. That's what it says.

25 Q. I am just asking you if that's correct?

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A. If the calculation is correct, yes.

Q. Do you see anything on here that is calculated incorrectly?

A. I cannot tell you at the moment. When I did that, I went through my time sheets, I don't have my time sheets in front of me. I cannot

Q. When you mentioned time sheets, what time sheets do you have?

A. I said at the time I had time sheets regarding period of time that we are talking about.

Q. What is what I asked you. What time sheets are you referring to?

A. From work.

Q. Those were your time sheets?

A. What do you mean, that is my record?

Q. Well, I am asking you, what are the time sheets that you were referring to?

A. I had my my time sheets from work that I made a copy of them.

Q. What became of that copy?

A. Gone. I don't have it anymore.

Q. When was the last time you saw them?

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A. [REDACTED] do not recall.

Q. Did you have those records in front of you when this document was prepared?

A. When this document -- I believe I had it yes, I did. I couldn't do it without the document.

Q. How many time sheets did you have?

A. Every two weeks. One, go from November 1, 1980 -- whichever it said here, until -- two years. I do not recall. The pages -- whichever.

Q. Where were you when you were reviewing your time sheets for the purposes of putting together Defendant's A?

A. I believe at the library.

Q. What library was that?

A. I do not recall.

Q. Is it in the United States or in Israel?

A. I believe in United States.

Q. In New York or in New Jersey?

A. I cannot tell you.

Q. Did you ever provide anyone with copies of those time sheets?

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2 A. If I ever provided anybody with these  
3 time sheets? Not that I recall.

4 Q. Were you ever asked to provide anyone  
5 with copies of your time sheets?

6 A. No.

7 Q. [REDACTED] sick hours  
8 you see what I am referring to?

9 A. [REDACTED] the first column.

10 Q. [REDACTED] the first column.

11 What does "sick hours" refer to?

12 A. That is what I took hours from my  
13 account, that is what I reserve for sick hours.  
14 Meaning when I am sick I am taking this as a day  
15 off.

16 Q. Were there certain number of sick hours  
17 allocated to you on a yearly or some other basis?

18 A. I have 70 hours, I believe.

19 Q. 70 hours a year?

20 A. [REDACTED] yes.

21 Q. [REDACTED] the entries in the sick  
22 hour column, do you know what specific days these  
23 hours relate to?

24 A. For the payroll period November 30, 1991  
25 to December 13, 1991, it's regarding the 12th and

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Q. I am sorry, it would be the what and

A. December 12th and December 13th. For

the period of December 14, 1991 to December 27, 1991

I have a calendar in front of me at this time. I

can give you better details, but

Q. If you had a what in front of you

A. A calendar. But what I know that I

and I worked for, I came after surgery on the

12th, which was. I don't recall if it was Tuesday

or Wednesday, I was there for one day, and then I

did not come back to work for another two or three

days and then I came back for a day or two, and

this is how this is how everything goes here.

Q. When was your surgery, by Dr. Strauch?

A. December 12th.

Q. December 12th of what year?

A. '91. That's why when I said before

December nine, I have been first to come back to

work in 1992, I refer to 1991.

Q. Did you return to work on December

15th?

A. 15th, no.

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Q. [REDACTED] about December 14th?

3

A. No.

4

Q. When did you return to work?

5

A. December 18th.

6

Q. So then the 28 hours for December 14th

7

through December 27th, what days does that refer

8

to?

9

A. [REDACTED] as I said, I cannot tell

10

you exactly all -- full details because -- I came

11

on the 18th for the -- for one day --

12

Q. You came in when?

13

A. The 18th of December. For one day, and

14

I left work again for a few days. And I came back

15

for one day, for two days. And I came, I left again

16

for -- for three or four days. So -- I cannot give

17

you --

18

Q. How many hours a day did you work?

19

A. I work seven hours, I work three --

20

worked 15 hours a week.

21

Q. Is that roughly seven hours a day?

22

A. Yes.

23

Q. So then --

24

A. 28 hours --

25

Q. 28 hours is four days?

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2 A. That's correct.

3 Q. So for that two-week period of time --

4 A. Now you have 28 -- and you have 14 days /  
5 of leave with pay. It's meaning we have held four /  
6 and two six. So I was there only four days.

7 Q. So in the period December 14th to /  
8 December 27th, you worked four days?

9 A. Four days. I was there four days. If I /  
10 worked, it's a different story.

11 Q. Were there times when you went to work /  
12 and didn't do any work?

13 A. In the, didn't have any work for me, /  
14 the rest of the time. Except for the 18th.

15 Q. How do you know you had work on the /  
16 18th?

17 A. Because I had to go to do some work /  
18 on the 18th.

19 Q. What work did you have to do on the /  
20 18th?

21 A. Videotaping a guest lecturer, somebody /  
22 came from outside.

23 Q. Who was the guest lecturer?

24 A. Somebody from the government, I do not /  
25 know.

1 GILADI

2 Q. How is it you recall that that was on  
3 December 18th, nine years ago?

4 A. Because I injured my right hand on that  
5 day.

6 Q. How did you injure your right hand at  
7 that time?

8 A. I was having a friend who was doing all  
9 the heavy work for me. We have to move equipment  
10 from one -- from a very narrow area, he couldn't do  
11 it by himself. I tried to help him with one hand,  
12 with my right hand, because my left hand was with  
13 the cast, and disabled and something happened  
14 and-- fall on me and I protect myself with my  
15 right hand, so the carriage fell on my right hand.  
16 And injured my hand.

17 Q. Did you make a Workmen's Comp. for  
18 that?

19 A. My attorney, with error, filed a  
20 complaint, but I -- withdraw the complaint. There  
21 was no evidence, no -- the -- the complaint was  
22 being written incorrectly.

23 Q. ~~you filed a Worker's Compensation~~  
24 ~~claim?~~

25 A. ~~I did not file Workers Compensation. I~~

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2 said my attorney, by mistake. When I find out

3 about the error, I inform him that this is not

4 what I have intention to do.

5 And, we just said to Court we withdraw the case

6 this time.

7 Q. Did you sign any paperwork for that

8 workers' comp claim?

9 A. My attorney gave me papers. I signed. I

10 do not question what I have in front of me. When I

11 find out it was a mistake, I discuss it with the

12 attorney.

13 Q. Why did you consider it a mistake?

14 A. Why?

15 Q. Yes.

16 A. Because I never had an intention to

17 file a claim for my right hand.

18 Q. Was your right hand injured?

19 A. Yes.

20 Q. Was it injured in the course of your

21 job?

22 A. Yes, but not everything that you get

23 injured for you go to sue for.

24 Q. Did you consider it a small injury?

25 A. I do not know what I considered it.

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considered it that it's not something that really I  
would like -- I'd have a big deal of

Q. Did you have any problems with your  
right hand after that?

A. Yes, I did.

Q. For what period of time?

A. I have for a few days, but it's not  
what stopped me from -- it's not, if you are  
talking about problem, can you tell me exactly what  
kind of problem?

Q. I am asking you what kind of problems  
you had with your hand.

A. I had some swelling, that's the only  
thing I had, but really not something that was any  
significant -- I could work with my right hand with  
no problem if I could work with my left hand.

Q. I am not sure I understand your  
answer.

A. If my left hand was not with the cast,  
and I could use my left hand and my right hand at  
the same time, I was going to go to work, with no  
problem. Meaning that my right hand did not stop  
me from anything.

Q. From the payroll period beginning